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UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

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13 CHASOM BROWN, WILLIAM BYATT,  
14 JEREMY DAVIS, CHRISTOPHER  
15 CASTILLO, and MONIQUE TRUJILLO,  
16 individually and on behalf of all similarly  
17 situated,

Plaintiffs,

v.

18 GOOGLE LLC,

19 Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING  
MOTION TO SEAL**

Judge: Hon. Susan van Keulen

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## [PROPOSED] ORDER

2 Before the Court is Google LLC’s Administrative Motion to Seal Portions of Google’s  
3 Motion for Leave to File A Sur-Reply to Plaintiffs’ Reply in Support of Their Supplemental  
4 Sanctions Brief (“Motion”). Having considered the Motion, supporting declaration, and other  
5 papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Exhibit 1 (Google's Sur-Reply to Plaintiffs' Reply in Support of Their Supplemental Sanctions Brief)	GRANTED as to the portions at: 2:5-8, 3:4, 3:6, 3:8, 3:10-15	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal databases, logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal data logging infrastructure.
Trebicka Exhibit A (Excerpts from the Deposition of Rory McClelland)	GRANTED as to the portions at: 165:3-4, 166:11-13, 166:17-24	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including details regarding Google's internal projects, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in

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		this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal data logging infrastructure.
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**SO ORDERED.**

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DATED: \_\_\_\_\_

HON. SUSAN VAN KEULEN  
United States Magistrate Judge